

IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NORTHEASTERN DIVISION

UNITED STATES OF AMERICA

v.

GEORGIANNA A.M. GIAMPIETRO

No. 2:19-cr-00013
Chief Judge Crenshaw

JOINT PROPOSED SCHEDULING ORDER

COMES NOW the United States of America, by and through its attorneys, the Acting United States Attorney for the Middle District of Tennessee and the Chief of the Counterterrorism Section of the National Security Division, United States Department of Justice, and Charles Swift and Peter Strianse, counsel for defendant, and hereby respectfully submit this *Joint Proposed Scheduling Order* for the Court's consideration.

PROPOSED SCHEDULING ORDER

At the upcoming status conference in the above-referenced case, currently scheduled for September 2, 2021, at 1:00 p.m., the parties expect the Court will select a new trial date. In anticipation of this, the parties conferred about a proposed scheduling order related to trial-related deadlines in an effort to provide such dates to the Court ahead of the status conference.¹ Thus, if the proposed dates are acceptable to the Court in light of the Court's congested calendar, the parties would ask that the Court adopt these dates and enter a scheduling order accordingly.

1. **Jury Trial** in this case will begin at 9:00 a.m. on **January 26, 2022**, with an expected duration of approximately two weeks.²

¹ Defense counsel has yet to confirm Mr. Strianse's availability for a January 26, 2022, trial date.

² The parties realize January 26, 2022, is a Wednesday, and the Court generally starts jury trials on Tuesdays. One of the Government's main witnesses is currently scheduled to be out of this country during a large portion of January 2022. The parties believe that a start date of January 26, 2022, will allow for this witness to return to the United States before her anticipated testimony is needed

2. Any *Daubert* challenges and/or Motions in Limine specifically related to experts shall be filed no later than October 22, 2021. Any responses to those motions/*Daubert* challenges shall be filed no later than November 5, 2021. Any replies shall be filed no later than November 12, 2021. If, after reviewing the parties' submissions, the Court believes a hearing is necessary, the Court shall schedule a hearing accordingly.

3. Any Exhibit and/or Witness Lists shall be filed on November 22, 2021.

4. An agreed set of jury instructions shall be filed no later than December 1, 2021. Alternative sets of jury instructions relating to any instructions on which the parties could not agree shall also be filed no later than December 1, 2021.

5. An agreed upon verdict form shall be filed no later than December 1, 2021. Alternative verdict forms relating to counts on which the parties could not agree shall also be filed no later than December 1, 2021.

6. A joint statement of the case shall be filed no later than December 1, 2021.

7. Any Motions in Limine shall be filed no later than December 1, 2021. Each Motion in Limine shall be limited to one topic. The motion shall be a self-standing document, with no incorporation by reference to facts or arguments made elsewhere. Responses to Motions in Limine shall be filed no later than December 15, 2021. Any replies shall be filed no later than December 17, 2021.

8. The Court will schedule a final pretrial conference between December 20 and 22, 2021, or during the week of January 3, 2022, in accordance with the Court's calendar.

at trial. The parties also advise that if the Court is unable to begin the trial on January 26, 2022, the trial could begin on any day between January 26, 2022, and January 31, 2022, for an anticipated completion date by February 11, 2022.

CONCLUSION

WHEREFORE, the parties request that the Court adopt the proposed scheduling order and trial date, if such dates are agreeable with the Court's calendar.

Respectfully Submitted,

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